

Product ingredient source information may be entitled to confidential treatment

DATE OUT: 01/JUN/2000

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: Manufacturing-Use [] End-Use Product [X]
DP BARCODE NoD265595 EPA RECEIVED DATE:01/MAY/2000 REG./File Symbol No:50404-3
PRODUCT NAME: C.I.C. Residual Insecticide No. 1, 0.5% permethrin, cis, trans MRID None
COMPANY NAME: Coulston Products, Inc. Action Code:345

FROM: Sami Malak, Chemist *Sami Malak*
Technical Review Branch/RD (7505C)

TO: 03 Arnold Layne/Linda DeLuise
Insecticide Branch/RD (7505C)

INTRODUCTION:

In a letter dated 27/JAN/2000, the applicant requested review for acceptability an alternate formulation for subject product, CSF dated 26/JAN/2000.

FINDINGS:

1. The subject product is produced by a non-integrated formulation system, meaning that the technical source is registered. The product contains 0.5% permethrin, [REDACTED]
2. The subject product is substantially similar to the current basic formulation, CSF dated 20/OCT/1999. Exceptions: (a) the use of an alternate source of the active ingredient, [REDACTED] instead of the currently approved source for permethrin, [REDACTED] and (b) the addition of a new inert ingredient with no change in the physical or chemical properties.
- 3a. The submitted product's alternate formulation CSF dated 24/MAR/2000 was filled out correctly and completely as per the regulations of PR Notice 91-2. Further, the upper and lower certified limits of the ingredients are within the standard limits of 40CFR§158.175(b)(2). All ingredients claimed on the CSF are cleared for use in pesticide formulations.
- 3b. A clearance request was submitted to the Inert Ingredients Group for clearance of the new inert ingredient marked "X" in the submitted alternate formulation, CSF dated 26/JAN/2000. The CRM will be informed as soon as a clearance is received.

CONCLUSIONS:

Pending resolution of Finding 3(b) above, we will have no objections for a approval of the submitted alternate formulation, CSF dated 26/JAN/2000.